

**WATER & SEWER  
COMMISSION**

March 8, 2019

Kevin Brander, PE, Section Chief  
Wastewater Management Section DEP/NERO  
205B Lowell Street  
Wilmington, MA 01887

Re: Third Modified Consent Decree Civil Action No. 76-cv-02184-RGS  
LWSC Infiltration Inflow (I/I) Program  
Response to DEP Comments, dated February 6, 2019

Dear Mr. Brander:

The Lynn Water & Sewer Commission (Commission, LWSC) has reviewed DEP's comments on the Flow Metering and I/I Prioritization Report, dated February 6, 2019, and provides the following response.

Attached please find the Summer & Cottage Street Combined Sewer Separation Project Inflow Investigation Project (1999) report as requested in Item #2 for MassDEP review.

In response to Items 1, 3, 4:

The Commission is in agreement with and has followed the agencies request that "I/I abatement work should be done in close coordination with the CSO abatement work so that the expected benefits of the CSO control work are fully achieved" and "sharing...scoping of I/I abatement work with the Commissions design consultant for the CSO control work." As a result, it was recognized by the Commission and its CSO consultant that there is a substantial amount of information needed to submit an adequate plan for agency review/ acceptance; including hydraulic modeling studies and financial analyses for cost effective scheduling.

Separation work in the downstream system will need to be completed or nearing completion so the benefits of major system improvements are fully realized and reflected in the hydraulic model. With this information, a more accurate plan can be developed to target specific inflow sources to effectively reduce or eliminate CSO activations. This targeted strategy will also guide better investment decisions for drain line extensions, etc.

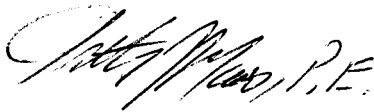
A Financial Capability Assessment is in development by the Commission. Preliminary findings of this analysis indicate the Commission and ratepayers will be facing very high financial impacts over the next decade due to several large infrastructure investment requirements, including work in the West Lynn area estimated at approximately \$89M, an estimated \$80 of escalated costs for the 005 area Sewer Separation Project, and other large scale investments at the WWTP.

Pursuant to the Water Infrastructure Flexibility Act H.R.7279, the Commission and it's CSO design consultant would like to take this opportunity to request a meeting with the agencies to discuss creating an integrated plan, which will allow the Commission to complete these projects in a way that will provide real benefit to the infrastructure, the residents of Lynn, and the waters of the USA.

For questions, comments, or additional information, please do not hesitate to contact me by phone or e-mail.

Thank you in advance for your consideration.

Sincerely,



Anthony Marino, P.E.  
Chief Engineer  
Lynn Water & Sewer Commission

cc via e-mail: David Elmer, Weston & Sampson Engineers  
David VanHoven, Stantec Consulting Services Inc.  
Daniel O'Neill, LWSC Executive Director  
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